

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) Criminal No. 04-10068-RWZ
v.)
)
ALEX ARANGO-PEREZ)
)
Defendant.)

GOVERNMENT'S ASSENTED TO MOTION TO
CONTINUE SENTENCING TO JUNE 16, 2005

The United States of America, by its attorneys, Michael J. Sullivan, United States Attorney for the District of Massachusetts, and David G. Tobin, Assistant United States Attorney, with the assent of James Cipolella, counsel for the defendant, requests that the defendant's sentencing be continued to June 16, 2005.

As grounds for the requested delay, the United States avers that the undersigned is unavailable on June 2, 2005, the date on which the defendant is scheduled to be sentenced. The undersigned is scheduled to attend a conference at the National Advocacy Center in Columbia, South Carolina from June 1 through June 5, 2005. Additionally, the undersigned is scheduled to attend a conference in New Hampshire from June 7 through June 9, 2005. The Court has a full docket on June 14 and 15, 2005, but apparently has time available to take the sentencing on June 16, 2005. The requested delay will also afford the Substantial Assistance Committee of the United States Attorney's Office

sufficient time to give the defendant's previously provided assistance full consideration.

Conclusion

The United States respectfully asks this Court to continue the defendant's sentencing until June 16, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ David G. Tobin
DAVID G. TOBIN
Assistant U.S. Attorney

Dated: June 1, 2005